

Message

---

**From:** Seligman, Angela N. [aseligman@nd.gov]  
**Sent:** 9/20/2019 6:37:40 PM  
**To:** Lagerstrom, Mitch [Mitch.Lagerstrom@crestwoodlp.com]  
**CC:** Rookey, Adam S. [arookey@nd.gov]; North, Alexis [North.Alexis@epa.gov]  
**Subject:** RE: Arrow Field Services, LLC Bear Den Gas Plant - tank emissions video

Dear Mr. Lagerstrom,

The North Dakota Department of Environmental Quality, Division of Air Quality (Department) met with Fielding Lewis and Donald Fuller of Crestwood Equity Partners, LP (Crestwood) on September 16<sup>th</sup>, 2019 at approximately 4:45 pm CDT at the Bear Den Gas Plant. I discussed my concerns with them regarding initially being told that there was no issue with any tanks at the Bear Den Gas Plant and then being informed that there was an issue causing the automated dump valve from the slop separator to stick in the open position on August 22<sup>nd</sup>.

Alexis North from the Environmental Protection Agency (EPA) was conducting inspections with the Department on September 16<sup>th</sup>. Ms. North noted that, according to the 40 CFR 60, Subpart OOOOa semi-annual report submitted to the EPA on June 4, 2019, the pressure relief valve associated with the vapor recovery unit and the condensate storage tanks is leaking, but is on delay of repair until December 31, 2019 since it will require a process unit shutdown. Ms. North stated that this could be where the plume is sourced from.

During the September 16, 2019 visit, Mr. Fuller escorted us to the south side of the facility where the condensate storage tanks are located. Department personnel and Ms. North utilized optical gas imaging (OGI) cameras to document that the plume is being sourced from the pressure relief valve, as was indicated in the June 4, 2019 Subpart OOOOa semi-annual report submitted to the EPA.

In addition, it was noted that gas was still being emitted from the RJT flare even though it was not turned on and is no longer in use. Mr. Fuller notified the Department later in the evening on September 16<sup>th</sup>, 2019 that he remedied the leak from the RJT flare after Department personnel left the facility.

It is the Department's understanding that the Bear Den Gas Plant is scheduled to be shut down for maintenance on October 1<sup>st</sup>, 2019. As the plume coming from the pressure relief valve appears to be significant, the Department recommends that all reasonable efforts be made to replace or repair the pressure relief valve during this scheduled shut down of the Bear Den Gas Plant.

I can understand the confusion sourced from the initial OGI video that was sent to Crestwood and the difficulty in determining the source of the plume, since the source was outside the view of the video. However, had more effort been made by Crestwood personnel to determine where the plume could be sourced from, such as reviewing previously submitted leak detection reports, much of this confusion could have been avoided.

The Department will require that Crestwood notify the Department once the pressure relief valve has been repaired or replaced. Following the replacement or repair of the pressure relief valve, we can schedule a permit to construct inspection of the Bear Den Gas Plant.

Following a permit to construct inspection that includes documenting that the source of the leak has been repaired, the Department will consider this matter closed.

Please let me know if you have any questions.

Angela Seligman, PhD  
*Environmental Scientist*  
*Division of Air Quality*

701.328.5291 • 701.328.5185 (fax) • [www.deq.nd.gov/AQ/](http://www.deq.nd.gov/AQ/)  
918 E. Divide Avenue • Bismarck, ND 58501-1947 • [Provide Feedback](#)

